

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

)	Criminal No.: 12-CR-00178 (JNE)
United States of America)	
)	
Plaintiff,)	
)	
)	DEFENDANT’S POSITION
)	REGARDING PRESENTENCE
)	REPORT AND SENTENCING
)	AND AUTHORITIES
Victoria Abeje Ayoola)	
)	
Defendant.)	
)	

TO: CLERK OF COURT, UNITED STATES DISTRICT COURT, DISTRICT OF MINNESOTA, 300 SOUTH FOURTH STREET, 200 U.S. COURTHOUSE MINNEAPOLIS, MINNESOTA 55415; ANDREW DUNNE, ASSISTANT UNITED STATES ATTORNEY, UNITED STATES ATTORNEY’S OFFICE, 404 UNITED STATES COURTHOUSE, 316 NORTH ROBERT STREET, ST. PAUL, MN 55101

Defendant Victoria Abeje Ayoola (hereinafter “Defendant”) by and through his counsel of record, Kenneth U. Udoibok, hereby files the forgoing position regarding sentencing.

Defendant’s position regarding sentencing herein is based upon the attached Memorandum of Points and Authorities, the United States Probation Office’s Presentence Report, evidence of Defendant’s cooperation, stipulations between Defendant and the United States of America (hereinafter “government”) files and records in this case, and any other evidence or argument that the Court may wish to consider at the time of sentencing.

Defendant herein reserves the right to file a response to any sentencing position filed or submitted by the government and to file any supplemental sentencing position(s) that the Court may deem necessary.

Respectfully Submitted,

Dated: November 14, 2012

UDOIBOK, DAVIS & TUPA, PLLP

/s/ Kenneth U. Udoibok

Kenneth U. Udoibok (262523)

The Grain Exchange Building, Suite 310

400 Fourth Street South

Minneapolis, MN 55415

612-808-6031 (phone)

612-843-1176 (fax)

Kudoibok@uthlaw.com

ATTORNEY FOR DEFENDANT